

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SUMMER CAMPBELL,

Plaintiff.

v.

LIBERTY MUTUAL  
INSURANCE,

Defendant.

Case No. 1:23-cv-5101

Judge John F. Kness

Magistrate Judge M. David Weisman

**JOINT STATUS REPORT**

Pursuant to the Order entered by Magistrate Judge Weisman (Dkt. #149) on January 6, 2026, Plaintiff Summer Campbell and Defendant Liberty Mutual Insurance submit the following Joint Status Report.

1. Since the last Joint Status Report, the Parties have engaged in additional settlement discussions. As a result, two of the three outstanding issues have been resolved:

- a. The parties have agreed to the monetary amount of the settlement conditioned on no additional substantive changes to the terms of the Settlement Agreement.
  - b. The parties have agreed on the return and/or destruction of all proprietary information in Plaintiff's possession. That information has now been returned and/or destroyed.
2. The only remaining open issue is the identification, and removal, of (as

applicable) currently known social media posts in which Plaintiff identifies or mentions Liberty Mutual, or its employees, from December 2022 through the present. Defendant has provided a list of the social media posts it wants deleted. Ms. Campbell has agreed to delete some, but not all of the posts. Ms. Campbell and her counsel are now preparing a list of the posts she is and is not willing to delete. They expect to have that list completed this week.

3. The Parties are hopeful that they can resolve this last issue within the next 1-2 weeks.

4. All other terms of the Settlement Agreement have been agreed to, and a final version of the Settlement Agreement has been prepared. Thus, once this last issue is resolved, the Settlement Agreement can be executed.

5. Ultimately, the parties anticipate being able to resolve this matter informally and will advise the Court as soon as they are able to do so.

Respectfully submitted,

SUMMER CAMPBELL

LIBERTY MUTUAL INSURANCE

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By: s/Erin Dougherty Foley  
Defendant's Attorney

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DATED: January 26, 2026